

**UTAH DEPARTMENT OF ENVIRONMENTAL QUALITY**

**DIVISION OF SOLID AND HAZARDOUS WASTE**

**OVERSIGHT OF COMMERCIAL SOLID WASTE MANAGEMENT  
FACILITIES**

**GUIDANCE**



September 2004

# **OVERSIGHT PROGRAM FOR COMMERCIAL SOLID WASTE FACILITIES**

## **Introduction**

The Utah State Legislature has provided for the safe management of solid and hazardous wastes through the enactment of the Utah Solid and Hazardous Waste Act and other related legislation. The purpose of these environmental statutes is to ensure that management of solid and hazardous wastes in Utah is conducted in a manner protective of human health and the environment.

The Legislature and Governor's Office have directed the Utah Department of Environmental Quality, Division of Solid and Hazardous Waste to develop and implement a regulatory program to oversight the commercial waste management businesses in Utah that is consistent with the intent of statutes and policies and that appropriately balances regulatory compliance and economic considerations.

## **Purpose**

The purpose of this document is to set forth the operating principles for regulatory oversight of the commercial solid waste facilities in Utah. This document describes the following elements of the Division's oversight program:

Applicability

Inspections Program

Inspection Checklists

Inspection Notification

Split Sampling of Ground Water

Inspection Reports

## **Applicability**

The regulatory oversight program described in this document applies to Class V and Class VI solid waste landfills and commercial solid waste incinerators operated in Utah. A current list of the facilities affected by this document is shown in Appendix I. Not all sections of this guidance

will apply to all facilities listed in Appendix I. These facilities are hereinafter also referred to as “commercial facilities.”

The Solid Waste Section of the Division of Solid and Hazardous Waste is responsible to implement the oversight program described in this document.

## Inspection Program

The purpose of the inspection program is to ensure that, over the course of a year, the compliance status of a commercial solid waste management facility is evaluated. This evaluation will be accomplished through the inspection process outlined below.

Division inspectors perform a wide variety of inspections at the commercial facilities, including the following:

### Routine Oversight (RO)

These are routine inspections of disposal facilities to evaluate compliance with the requirements of Utah's Administrative Code and State-issued permits. ROs encompass a file review prior to the site visit, an on-site examination of treatment, storage, or disposal areas, gas and ground water monitoring system, and a review of records. ROs may focus on a specific area of the operation and may be conducted as a follow up to a previous inspection where a deficiency was noted and the timeframe for compliance given. ROs may be either announced or unannounced. RO inspections should be conducted at a frequency that reflects the facility size and type of waste received, but no less than twice per year for all commercial facilities and quarterly for ECDC. At least one unannounced RO inspection should be conducted at each facility each year.

### Monitoring Evaluation (ME)

These are inspections conducted to ensure that groundwater-monitoring system is designed and functioning properly at disposal facilities. In addition to the RO activities outlined above, MEs include sampling of ground water and analysis of the facility's groundwater monitoring system and hydrogeological conditions. This inspection will be conducted at a frequency of once every five years at all facilities with ground water monitoring systems in place, or as needed if the facility has had a significant change in hydrogeological conditions or the groundwater monitoring system since the last ME.

### Facility Status (FS)

These are inspections are conducted when a facility has constructed a new disposal cell or part of a disposal cell. The inspection is to see that the construction has been completed and that the cell is ready for receipt of waste. These inspections are conducted, as necessary, prior to approval of a newly constructed area for receipt of waste.

### Permit-required construction certification inspections (CCI)

These are specialized inspections of permitted construction such as landfill cells, new process equipment, and other permit construction activities. CCIs are only conducted as needed. As is the case for the previous inspection types, an inspection report is prepared for each CCI.

### Inspection Checklist

To ensure that each commercial facility's compliance with all applicable permit conditions and solid waste management rules is evaluated at least once per calendar year, Division inspectors use inspection checklists.

However, priority will be given to those areas of the facility that have had problems or that, in the judgment of Division management or the inspector, deserve more attention. If substantial effort is dedicated to certain aspects of the facility's compliance, there may be areas that aren't evaluated during that fiscal year. If this happens those areas will be given a high priority for the next year.

A copy of the checklist is included with each inspection report. The checklist should be modified as necessary to keep current with the permit. The type of checklist used may be modified as new ideas or better ways are discovered. Attachment II to this document is an example of a facility checklist.

### Inspection Notification

Both announced and unannounced inspections will be conducted at commercial facilities. During each year at least one unannounced inspection will be conducted at each commercial facility.

The local health departments will be notified in advance of our inspections. Notification will, in most cases, be by phone or email and will be given two days prior to the inspection. Some unannounced inspections may require that notice be given on the day of the inspection.

### Split Sampling of Groundwater

The purpose of split sampling of groundwater is to confirm that the laboratories analyzing the commercial facilities' samples are providing accurate data. Some Class V commercial facilities are required to monitor groundwater. Split sampling will be conducted at all Class V facilities required to monitor ground water.

These facilities have wells located up and down gradient of the landfill cells. The wells are sampled at least twice per year. The samples are then sent to an off-site laboratory for analysis. Duplicates and sample blanks are used to help verify that the laboratory is accurately reporting the results. Split samples will be collected at least once during the life of the permit (five years). If, for any compound, the analytical results from a split sample versus the facility-analyzed

sample show a positive percent change of more than 30% (based on the smaller value as the base value) between the two samples, an investigation will be initiated in order to identify any shortcomings in sample collection, sample analysis, or reporting.

All split samples are analyzed for the same parameters as the facility's samples. If the state health lab cannot meet this requirement, the Division's split samples will be sent to a state-certified commercial lab that has the ability to analyze equivalent parameters.

### Inspection Reports:

At the conclusion of any on-site inspection, a *Solid Waste Facility Inspection Report Checklist* (see Attachment 1) with observations/concerns will be written and signed by the inspector.

The *Solid Waste Facility Inspection Report Checklist* should contain all of the information and observations resulting from the inspection. Each area of the solid waste facility operation that is inspected should be checked in the appropriate box on the *Solid Waste Facility Inspection Report Checklist*. Any box that is checked must have a comment that describes the inspector's observations related to that area.

The *Solid Waste Facility Inspection Report Checklist* should be signed by the lead of the inspection team and dated. Following the completion of the *Solid Waste Facility Inspection Report* a final inspection report is completed. The final inspection report should contain the *Solid Waste Facility Inspection Report Checklist* and a draft letter to the facility stating the results of the inspection and any actions that are to be taken.

### Solid and Hazardous Waste Control Board Concurrence

The Solid and Hazardous Waste Control Board reviewed this guidance document and, as a result of that review, unanimously concurred with its purpose, use, and content during the Board meeting of October 14, 2004.

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## Attachment I



The following solid waste management facilities are currently covered by this Oversight Program:

ECDC Environmental LC, a commercial landfill in Carbon County; (Class V)  
Nielson Construction, a commercial landfill in Emery County; (Class V)  
Payson City, a commercial landfill in Utah County; (Class V)  
Dalton Brothers Construction, a commercial C&D landfill in Garfield County; (Class VI)  
Mountain View, a commercial C&D landfill in Salt Lake County; (Class VI)  
Waste Control Management, a commercial C&D landfill in Salt Lake County; (Class VI)  
Cedar Valley, a commercial C&D landfill in Utah County; (Class VI)  
Molding & Sons, a commercial C&D landfill in Weber County, (Class VI)  
Weber Construction, a commercial C&D landfill in Weber County; (Class VI) and  
Stericycle, a commercial incinerator in Davis County





## Attachment II



# SOLID WASTE FACILITY INSPECTION REPORT CHECKLIST

## UTAH DIVISION OF SOLID & HAZARDOUS WASTE

Facility Name \_\_\_\_\_ County \_\_\_\_\_

Location \_\_\_\_\_

Inspection Date \_\_\_\_\_ Time In \_\_\_\_\_ Time Out \_\_\_\_\_

Routine Oversight ☐ Follow up ☐ Monitoring Evaluation ☐ Facility Status ☐ Construction Review ☐

Announced ☐ Unannounced ☐ Weather Conditions \_\_\_\_\_

Inspection Goal \_\_\_\_\_

Facility Contact \_\_\_\_\_

Participants \_\_\_\_\_

Follow Up Inspection Needed Yes ☐ No ☐ Recommended Follow Up Date \_\_\_\_\_

(X - indicates items reviewed)

### 1. PRE-INSPECTION REVIEW

<input type="checkbox"/>	Permit Review
<input type="checkbox"/>	Annual Report Review
<input type="checkbox"/>	Previous Inspection Review
<input type="checkbox"/>	Facility Contacts Confirmed
<input type="checkbox"/>	Facility Contacted (if announced inspection)

### 2. FACILITY / OPERATIONAL CONTROLS

<input type="checkbox"/>	Litter
<input type="checkbox"/>	Roads
<input type="checkbox"/>	Gate House Operations
<input type="checkbox"/>	Vectors
<input type="checkbox"/>	Communications
<input type="checkbox"/>	Recycling Area
<input type="checkbox"/>	Fugitive Dust Control
<input type="checkbox"/>	Inspection Area
<input type="checkbox"/>	Scavenging Control
<input type="checkbox"/>	Open Burning
<input type="checkbox"/>	Fences, gates, locks, Access Control
<input type="checkbox"/>	Working Face
<input type="checkbox"/>	Other

### 3. SIGNS REQUIRED / PROPERLY POSTED

<input type="checkbox"/>	Operating Days / Hrs.
<input type="checkbox"/>	Other Info as Require
<input type="checkbox"/>	Fires Prohibited
<input type="checkbox"/>	Directions & Procedure
<input type="checkbox"/>	Emergency Numbers
<input type="checkbox"/>	Scavenging Prohibited
<input type="checkbox"/>	List of Unacceptable Materials
<input type="checkbox"/>	Other

### 4. OPERATOR / REPRESENTATIVE / EMPLOYEES

<input type="checkbox"/>	On-site while open
<input type="checkbox"/>	Training
<input type="checkbox"/>	Other

### 5. MONITORING

<input type="checkbox"/>	Methane
<input type="checkbox"/>	Random Inspections
<input type="checkbox"/>	Leachate
<input type="checkbox"/>	Ground Water
<input type="checkbox"/>	Unauthorized Waste Handling
<input type="checkbox"/>	Other

# SOLID WASTE FACILITY INSPECTION REPORT

Date: \_\_\_\_\_ Facility Name: \_\_\_\_\_

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## 6. DRAINAGE / EROSION

<input type="checkbox"/>	Water Run-on
<input type="checkbox"/>	Water Run-off
<input type="checkbox"/>	Other

## 7. PROPER STORAGE / ISOLATION / DISPOSAL

<input type="checkbox"/>	Special Waste
<input type="checkbox"/>	Batteries
<input type="checkbox"/>	Hazardous Waste
<input type="checkbox"/>	Infectious Waste
<input type="checkbox"/>	Tires
<input type="checkbox"/>	Dead Animals
<input type="checkbox"/>	Asbestos
<input type="checkbox"/>	Bulky Waste
<input type="checkbox"/>	Contaminated Soil
<input type="checkbox"/>	Ash
<input type="checkbox"/>	Petroleum Waste
<input type="checkbox"/>	Sludge
<input type="checkbox"/>	Other

## 8. COVER

<input type="checkbox"/>	Daily - Soil
<input type="checkbox"/>	Daily - Alternative
<input type="checkbox"/>	Intermediate
<input type="checkbox"/>	Final
<input type="checkbox"/>	Vegetation
<input type="checkbox"/>	Other

## 8. PLANS / PROGRAMS ON FILE

<input type="checkbox"/>	Contingency
<input type="checkbox"/>	Operating / Maintenance

<input type="checkbox"/>	Inspection
<input type="checkbox"/>	Removal-Stored Waste
<input type="checkbox"/>	Facility Site Plan
<input type="checkbox"/>	Leachate Control
<input type="checkbox"/>	Closure / Post Closure
<input type="checkbox"/>	Deviation from Plans
<input type="checkbox"/>	Methane Monitoring
<input type="checkbox"/>	Training Programs
<input type="checkbox"/>	Groundwater Monitor
<input type="checkbox"/>	Disposal Management
<input type="checkbox"/>	Disease Vectors / Rodent Control
<input type="checkbox"/>	Fire Protection & Prevention
<input type="checkbox"/>	Other

## 10. INSPECTION RECORDS

<input type="checkbox"/>	Random Inspection Report
<input type="checkbox"/>	Gas Monitoring System
<input type="checkbox"/>	Surface Drainage Control
<input type="checkbox"/>	Daily Records
<input type="checkbox"/>	Leachate Collection System
<input type="checkbox"/>	Weight or Volumes
<input type="checkbox"/>	Intermediate Cover
<input type="checkbox"/>	Types of Waste Received
<input type="checkbox"/>	Final Cover
<input type="checkbox"/>	Self Inspection (Quarterly) Reports
<input type="checkbox"/>	Other

## 11. MONITORING / SAMPLING / ANALYSIS RECORDS

<input type="checkbox"/>	Methane Monitoring
<input type="checkbox"/>	Leachate Sampling & Treatment

**SOLID WASTE FACILITY INSPECTION REPORT**

Date: \_\_\_\_\_ Facility Name: \_\_\_\_\_

<input type="checkbox"/>	Ground Water Sampling Results
<input type="checkbox"/>	Other

**12. SPECIAL WASTE RECORDS**

<input type="checkbox"/>	Lab Analysis Results
<input type="checkbox"/>	Manifests
<input type="checkbox"/>	Treatment Certification
<input type="checkbox"/>	Paint Filter Test Results
<input type="checkbox"/>	Remediation Documentation
<input type="checkbox"/>	Other

**13. SPECIAL PERMIT REQUIREMENTS**

<input type="checkbox"/>	_____
<input type="checkbox"/>	_____
<input type="checkbox"/>	_____

**14. OTHER ITEMS**

<input type="checkbox"/>	_____
<input type="checkbox"/>	_____
<input type="checkbox"/>	_____
<input type="checkbox"/>	_____
<input type="checkbox"/>	_____
<input type="checkbox"/>	_____

DSHW Inspector Signature: \_\_\_\_\_

DSHW Inspector Name (type or print): \_\_\_\_\_ Date: \_\_\_\_\_